

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**RACHEL RAMSBOTTOM, and )  
ALEXIS BOWLING, )**

**Plaintiffs, )**

**v. )**

**LORIN ASHTON, AMORPHOUS )  
MUSIC, INC., BASSNECTAR )  
TOURING, INC., REDLIGHT )  
MANAGEMENT, INC., C3 PRESENTS, )  
L.L.C, INTERACTIVE GIVING FUND, )**

**Defendants. )**

**CIVIL ACTION NO. 3:21-cv-00272**

**JURY TRIAL DEMANDED**

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**MOTION FOR ADMISSION *PRO HAC VICE* OF STACEY M. ASHBY AND  
MITCHELL SCHUSTER**

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Pursuant to Rule 83.01(b) and (d) of the Local Rules of Court for the United States District Court Middle District of Tennessee, Defendants Lorin Ashton, Amorphous Music, Inc., and Bassnectar Touring, Inc. respectfully move this court to grant Stacey M. Ashby and Mitchell Schuster admission *pro hac vice* in the above-referenced matter. In support of this motion, Defendants state:

1. Ms. Ashby and Mr. Schuster seek admission in the above-referenced matter on behalf of Defendants Lorin Ashton, Amorphous Music, Inc., and Bassnectar Touring, Inc.
2. Ms. Ashby is a partner at Meister Seelig & Fein LLP, 125 Park Avenue, 7th Floor, New York, NY 10017, 212-655-3562. Ms. Ashby's email address is [sma@msf-law.com](mailto:sma@msf-law.com).
3. Ms. Ashby is a member of good standing and is admitted to practice before United States District Court, Southern District of New York. Her Certificate of Good Standing from the United States District Court for the Southern District of New York is filed herewith.

4. Mr. Schuster is a partner at Meister Seelig & Fein LLP, 125 Park Avenue, 7th Floor, New York, NY 10017, 212-655-3562. Mr. Schuster's email address is [ms@msf-law.com](mailto:ms@msf-law.com).

5. Mr. Schuster is a member of good standing and is admitted to practice before United States District Court, Southern District of New York. His Certificate of Good Standing from the United States District Court for the Southern District of New York is filed herewith.

6. There are no disciplinary proceedings by any disciplinary authority, a finding of contempt or a sanction under 28 U.S.C. § 1927 by any court, or any criminal charges instituted against either Ms. Ashby or Mr. Schuster.

7. Ms. Ashby and Mr. Schuster agree to subject themselves to the jurisdiction of the courts of Tennessee in any manner arising out of their conduct in such proceedings and agree to be bound by the Code of Professional Responsibility applicable to Tennessee lawyers and the interpretation thereof by Tennessee courts.

8. Ms. Ashby and Mr. Schuster have associated with Robert A. Peal, Mark W. Lenihan, Grace A. Fox, and the law firm of Sims|Funk, PLC in this action as counsel for Defendants Lorin Ashton, Amorphous Music, Inc., and Bassnectar Touring, Inc. Robert A. Peal, Mark W. Lenihan, and Grace A. Fox are licensed in, in good standing with, reside in, and maintain an office in Tennessee.

9. This Motion is made without waiver of any defenses on the part of Defendants Lorin Ashton, Amorphous Music, Inc., and Bassnectar Touring, Inc.

WHEREFORE Defendants Lorin Ashton, Amorphous Music, Inc., and Bassnectar Touring, Inc. respectfully request that the Court grants Stacey M. Ashby and Mitchell Schuster admission *pro hac vice* in the above-referenced matter.

Dated: April 27, 2021

Respectfully Submitted,

s/ Robert A. Peal

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*Counsel for Defendant Lorin Ashton, Amorphous  
Music, Inc., and Bassnectar Touring, Inc.*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 27<sup>th</sup> day of April, 2021:

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s/ Robert A. Peal